



July 6, 2021

Dear Senators Warren, Markey, and Smith,

MOHELA is writing in response to your letter dated June 21, 2021, requesting information regarding our plans to support millions of federal student loan borrowers who are scheduled to end their 0% interest benefit and transition into repayment as early as October 1, 2021. While the transition of millions of student loan borrowers entering into repayment simultaneously is unprecedented, MOHELA recognizes and has been preparing for the opportunity to assist borrowers during this transition. As a nonprofit state instrumentality, we are keenly aware of our mission to assist student loan borrowers, particularly during this difficult time.

Federal Student Aid and MOHELA have engaged in discussions to identify flexibilities intended to ease the repayment transition, perform outreach prior to and after repayment begins, provide additional training for customer service representatives, and to retain and hire resources. We are committed to a coordinated and proactive approach providing support for student loan borrowers as they navigate through their repayment journey. In addition, during the COVID-19 period, daily reports have been provided to Federal Student Aid regarding the portfolio status and our staffing resources.

As requested, below please find MOHELA's responses to your questions and data obtained as of June 24, 2021:

*1) How many borrowers whose loans you service will be transitioning back to repayments in October 2021?*

MOHELA anticipates approximately 1,625,076 borrowers will transition back into repayment in October 2021.

*2) Please provide specific steps your company has taken and will take to ensure borrowers that it services successfully transition back to student loan repayments in October 2021.*

The items listed below are steps that MOHELA has taken thus far:

- Resource needs for MOHELA have been evaluated.
- Actively recruiting, hiring and training Customer Service Representatives (CSRs).
- Retained CSRs during the COVID-19 period through work performed for the Missouri Department of Labor and Industrial Relations.

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Exhibit

2



- Refresher training is scheduled for existing CSRs and management.
- Borrower cohorts have been identified for targeted outreach by MOHELA, however a change request was received on June 29, 2021 which is anticipated to modify the applicable cohorts.
- Anticipate the receipt of an updated Communication Playbook from Federal Student Aid.
- mohela.com/app has been evaluated for placement of general messaging revisions and customized alerts and information for validation and updates after borrower authentication.
- The Customer Relationship Management (CRM) system has been evaluated for call flow updates specifically for entering back into repayment.
- Outbound calling campaigns to “check in” with borrowers commenced June 2021.
- Began testing advanced address cleansing software to identify and address validity to resolve location discrepancy for borrowers who have moved during COVID-19.
- Actively evaluating the impact of several change requests recently issued by Federal Student Aid to support borrowers entering back into repayment.

*3) How is your company informing borrowers enrolled in auto-payment that their accounts will be auto-debited as of October 2021?*

MOHELA planned to send notification during July and August urging borrowers to review their Auto Debit information in advance of entering back into repayment. However, Change Request 5881,<sup>1</sup> Active Confirmation of ACH/Auto-Debit Payment Restart, was recently received from Federal Student Aid requiring specific action, outreach, tracking, and reporting associated with borrowers that would have otherwise automatically restarted Auto Debit in October 2021.

*a) How is your company providing borrowers with the option of cancelling or delaying auto-debits?*

Please refer to Change Request 5881, Active Confirmation of ACH/Auto-Debit Payment Restart, for more information. In addition, borrowers may cancel or suspend their Auto Debit up to 3 business days prior to their due date.

*b) How is your company accommodating borrowers enrolled in auto-payment whose financial circumstances have changed?*

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<sup>1</sup> Please see Attachment A





Please refer to Change Request 5881, Active Confirmation of ACH/Auto-Debit Payment Restart, for more information. As of June 28, 2021, MOHELA received required communication content from FSA regarding Auto-Debit outreach.

*4) What proactive approaches has your company taken to ensure that student loan borrowers are in the right payment plan once their payments resume? Please provide details on these outreach efforts.*

As mentioned in the response to question 2, MOHELA is making outbound calls to “check in” with borrowers which includes repayment plan information. In lieu of specific direction from Federal Student Aid, MOHELA was planning to perform outreach targeting specific borrower cohorts through various communication channels. The communication is intended to inform them of their repayment plan and suspension options. These cohorts identified by MOHELA include but are not limited to:

- Income Driven Repayment borrowers that missed the recertification deadline prior to COVID-19;
- Income Driven Repayment borrowers that will be due for a partial financial hardship payment beginning in October 2021;
- Borrowers that were to enter into repayment for the first time after their grace period ended and this repayment start was delayed;
- Borrowers who were delinquent and others that were severely delinquent prior to the COVID-19 forbearance being applied;
- Borrowers with suspended payments prior to the COVID-19 forbearance and are scheduled to begin repayment in October 2021;
- Parent Plus borrowers for whom consolidation may be an option to enter into an Income Driven Repayment Plan;
- Borrowers on a graduated, level or fixed repayment plan.

Please note that MOHELA will modify cohorts and outreach efforts based on direction received from FSA through change requests in which MOHELA receives the required authorization to operate. Change Request 5965,<sup>2</sup> Outbound Engagement with At Risk Borrowers, was received from FSA on June 29, 2021 which identified the following cohorts for anticipated outreach:

- Had a 90+ day delinquent loan prior to March 13, 2020. Includes borrowers on an IDR plan, but who were previously delinquent.
- Had a delinquent loan under 90 days prior to March 13, 2020. Includes borrowers on an IDR plan, but who were previously delinquent.
- Exited grace on or after March 13, 2020.

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<sup>2</sup> Please see Attachment B



- In a prior bankruptcy over the last 3 years.
- Successfully rehabilitated their loans and were transferred to a servicer before September 2020.
- Successfully rehabilitated their loans after October 2020
- Previously missed payments within their first three months of entering repayment between March 13, 2019 to March 13, 2020.
- Entered a non-administrative forbearance on two or more occasions or continuously for any period between March 13, 2019 to March 13, 2020.
- Missed two or more consecutive payments on three or more occasions between March 13, 2019 to March 13, 2020.
- Paused, missed, or made partial payments while enrolled in an IDR plan between March 13, 2019 to March 13, 2020.
- Borrowers who withdrew without graduating or did not complete a program of study.
- On IDR prior to March 13, 2020 but have yet to recertify their IDR before the end of the extension period.
- Had other indicators of repayment distress between March 13, 2019 and March 13, 2020 (at discretion of the servicer)
- Post COVID-19 Forbearance Period Only – Borrowers who have missed their student loan payment.

*5) Millions of borrowers have allegedly been denied the benefits of programs intended to protect borrowers, including IDR, Public Service Loan Forgiveness, and the TEACH Grant program, as a result of government mismanagement and abuses by the student loan industry. What steps have you taken to ensure all eligible borrowers can benefit from these protections before payments resume?*

Please refer to responses for questions 2:

The items listed below are steps that MOHELA has taken thus far:

- Resource needs for MOHELA have been evaluated.
- Actively recruiting, hiring and training Customer Service Representatives (CSRs).
- Retained CSRs during the COVID-19 period through work performed for the Missouri Department of Labor and Industrial Relations.
- Refresher training is scheduled for existing CSRs and management.
- Borrower cohorts have been identified for targeted outreach by MOHELA, however a change request was received on June 29, 2021 which is anticipated to modify the applicable cohorts.
- Anticipate the receipt of an updated Communication Playbook from Federal Student Aid.



- mohela.com/app has been evaluated for placement of general messaging revisions and customized alerts and information for validation and updates after borrower authentication.
- The Customer Relationship Management (CRM) system has been evaluated for call flow updates specifically for entering back into repayment.
- Outbound calling campaigns to “check in” with borrowers commenced June 2021.
- Began testing advanced address cleansing software to identify and address validity to resolve location discrepancy for borrowers who have moved during COVID-19.
- Actively evaluating the impact of several change requests recently issued by Federal Student Aid to support borrowers entering back into repayment.

Please refer to response for question 4:

As mentioned in the response to question 2, MOHELA is making outbound calls to “check in” with borrowers which includes repayment plan information. In lieu of specific direction from Federal Student Aid, MOHELA was planning to perform outreach targeting specific borrower cohorts through various communication channels. The communication is intended to inform them of their repayment plan and suspension options. These cohorts identified by MOHELA include but are not limited to:

- Income Driven Repayment borrowers that missed the recertification deadline prior to COVID-19;
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- Borrowers with suspended payments prior to the COVID-19 forbearance and are scheduled to begin repayment in October 2021;
- Parent Plus borrowers for whom consolidation may be an option to enter into an Income Driven Repayment Plan;
- Borrowers on a graduated, level or fixed repayment plan.

Please note that MOHELA will modify cohorts and outreach efforts based on direction received from FSA through change requests in which MOHELA receives the required authorization to operate. Change Request 5965, Outbound Engagement with At Risk Borrowers, was received from FSA on June 29, 2021 which identified the following cohorts for anticipated outreach:



- Had a 90+ day delinquent loan prior to March 13, 2020. Includes borrowers on an IDR plan, but who were previously delinquent.
- Had a delinquent loan under 90 days prior to March 13, 2020. Includes borrowers on an IDR plan, but who were previously delinquent.
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- On IDR prior to March 13, 2020 but have yet to recertify their IDR before the end of the extension period.
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- Post COVID-19 Forbearance Period Only – Borrowers who have missed their student loan payment.

MOHELA provides information relative to these programs through various communications media and as directed by Federal Student Aid.

*6) Has your company identified at-risk student loan borrowers who struggled prior to the pandemic and so are likely to struggle once their payments go back into effect?*

Yes.

*a) Of these at-risk borrowers, how many were enrolled in auto-debit payments prior to the pandemic?*

Due to the issuance of Change Request 5965, Outbound Engagement with At Risk Borrowers, MOHELA will identify the at-risk populations requested for outreach when the authority to







operate has been received. Auto-Debit outreach will occur as identified under Change Request 5881, Active Confirmation of ACH/Auto-Debit Payment Restart.

*b) Please describe the targeted outreach efforts, if any, that your company has taken or intends to take to prepare these at-risk borrowers for the reactivation of their student loan payments in October 2021.*

Please refer to the responses for question 2:

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- Borrowers who withdrew without graduating or did not complete a program of study.
- On IDR prior to March 13, 2020 but have yet to recertify their IDR before the end of the extension period.





- Had other indicators of repayment distress between March 13, 2019 and March 13, 2020 (at discretion of the servicer)
- Post COVID-19 Forbearance Period Only – Borrowers who have missed their student loan payment.

*7) To date, how many student loan borrowers whose loans you service have contacted you about a change in their financial circumstances?*

This information was not tracked for reporting purposes.

*a) How many of these individuals have been placed in modified repayments plans that will take effect in October 2021?*

Please refer to the response for question 7:  
This information was not tracked for reporting purposes.

*b) What steps has your company taken to be prepared to handle many of these circumstantial changes simultaneously when the pause in payments is scheduled to end in October 2021?*

Please refer to the responses for questions 2:

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- Borrowers who withdrew without graduating or did not complete a program of study.
- On IDR prior to March 13, 2020 but have yet to recertify their IDR before the end of the extension period.
- Had other indicators of repayment distress between March 13, 2019 and March 13, 2020 (at discretion of the servicer)
- Post COVID-19 Forbearance Period Only – Borrowers who have missed their student loan payment.

*8) How much financial assistance did your company receive as a part of the American Rescue Plan package that went toward FSA? Please explain how this funding was used to improve service for borrowers.*

Change Request 5475 was issued to MOHELA on March 16, 2020 to provide Coronavirus Pandemic National Emergency ED emergency relief for student loan borrowers:

- This work involved changing over 2 million borrowers and their individual loans to accrue 0% interest retroactively beginning March 13, 2020.
- In addition, this work involved maintaining this 0% interest rate for all existing and new loans until notified by Federal Student Aid to end this rate.
- The implementation cost of this change request effort approved by Federal Student Aid and paid to MOHELA was \$28,742.18.

Change Request 5505 was issued to MOHELA on March 31, 2020 to provide Coronavirus Pandemic National Emergency relief for student loan borrowers:

- This work involved ceasing collections, billing, and Auto-Debit and to apply a non-capping Administrative Forbearance (COVID-19) to over 1.2 million borrowers and their individual loans retroactively beginning March 13, 2020 and ending September 30, 2020, while following specified and requirement exceptions.



- The cost of this implementation effort was approved by Federal Student Aid and MOHELA was paid \$36,515.60.
- Ongoing Costs:
  - Required notification of the forbearance being applied cost \$0.48 per USPS notice and \$0.02 per email/paperless delivery. As of May 2021, MOHELA has been paid \$422,112.48 for USPS notifications and \$48,581.54 for emails/paperless delivery.
  - Required creation and daily delivery of a required report cost \$36.46 per report. As of May 2021, MOHELA has been paid \$10,536.94 for report delivery.
  - Borrower forbearance web verbiage updates requested by Federal Student Aid cost \$96.80 per hour. As of May 2021, MOHELA has been paid \$96.80 for Federal Student Aid requested web verbiage updates.
  - IVR verbiage updates requested by Federal Student Aid cost \$133.07 per hour. No specific Federal Student Aid requested changes have been made.

9) *Did your company lay off any of its customer service staff during the pandemic?*

Yes.

a. *If so, how many staff positions have been eliminated and when were they laid off?*

A total of 63 staff members were laid off early in the pandemic between 4/3/2020 and 5/29/2020.

b. *How many of those positions have been or will be restored before September 1, 2021?*

MOHELA is on schedule to hire and train 74 staff members. We are evaluating additional staffing needs based on recent change requests issued by Federal Student Aid.

10) *Has your company hired any new staff in advance of the loan payment pause being lifted?*

Yes.

a. *If so, how many new customer service staff have you hired or do you intend to hire?*

MOHELA is on schedule to hire and train 74 staff members. We are evaluating additional staffing needs based on recent change requests issued by Federal Student Aid. MOHELA also intends to redeploy for Direct Loan servicing approximately 50 CSRs who are currently assisting the Missouri Department of Labor and Industrial Relations.



*b. How will you ensure that these new staff members are fully trained in advance of payments being restarted so that they can provide accurate information to borrowers and help them navigate complex processes (e.g., enrollment in income-driven repayment plans)?*

MOHELA has a comprehensive training approach and scheduled onboarding for these new staff members to be trained and ready to support repayment start by 9/1/2021.

*11) Please provide a breakdown of the number of federal direct loans you service that have:*

*a. Received a Total and Permanent Disability discharge during the pandemic;*

Based on a recent data query, 8,458 loans received a Total and Permanent Disability discharge.

*b. Received a Death discharge during the pandemic;*

Based on a recent data query, 6,089 loans received a Death discharge during the pandemic.

*c. Enrolled in an IDR program during the pandemic;*

Based on a recent data query, 257,148 loans enrolled in IDR during the pandemic.

*d. Achieved forgiveness under an IDR program during the pandemic;*

Based on a recent data query, 94 loans were forgiven under an IDR program during the pandemic.

*e. Received a closed school discharge during the pandemic;*

Based on a recent data query, 1,228 loans received a closed school discharge during the pandemic.

*f. Received a false certification discharge during the pandemic;*

Based on a recent data query, 8 loans received a false certification discharge during the pandemic.

*g. Received a unpaid refund discharge during the pandemic; and*





Based on a recent data query, 0 loans received an unpaid refund discharge during the pandemic.

*h. Been fully repaid during the pandemic.*

Based on a recent data query, 476,342 loans have been fully repaid during the pandemic.

*12) Have you advocated for policy changes, such as streamlined enrollment processes, a penalty-free period for non-payment, or debt cancellation, that would ease the transition back into repayment? Please describe any policy changes you have advocated for in conversations with ED, the White House, or Members of Congress.*

MOHELA has advocated for policy changes and communication ideas with Federal Student Aid to:

- Eliminate the requirement for borrowers to make at least a \$5.00 payment with a reduced payment forbearance to switch from one Income Driven Repayment (IDR) plan to another IDR plan.
- Increase the maximum number of eligible months for deferments e.g. unemployment, economic hardship.
- Authorize the Disaster Forbearance option if the repayment begin date is not extended beyond 9/30/2021 and loans reach 30 days past due.
- Remove pending guidance for the alternative repayment plans in which the borrower will be required to provide supporting documentation of hardship within 3 months to retain a lower fixed payment or fixed repayment term.
- Provide borrowers additional time to resolve and budget for repayment while allowing delinquency outreach to be phased in for servicers to focus on incoming customer inquiries.
- Allow servicers to automatically apply a 60-day, non-capping administrative forbearance if any loan becomes 15 days past due between 10/15/2021 and 12/31/2021, while maintaining the COVID-19 Credit Reporting during the Administrative Forbearance period.
- Simplify communication to alert and assist borrowers regarding the status of their StudentAid.gov log in credentials, the need to create one or if a reset is required.
- Exchange files with servicers to identify which customers have a valid and active user ID and Password for StudentAid.gov for servicers to know which customers need to create their log in.







- Provide servicers with information to communicate with borrowers regarding the ease of resetting StudentAid.gov.
- Ease the StudentAid.gov IDR esign process when Alternative Documentation of Income (ADOI) is required by allowing borrowers to upload their ADOI on StudentAid.gov and send this information electronically with the completed IDR application to the servicers for processing.
- Simplify the borrower process for completing and submitting a deferment/forbearance application on StudentAid.gov and establish a file exchange with servicers if the deferment/forbearance is self-certifying (no 3rd party certification necessary).
- Validate Auto-Debit information prior to billing/extraction.

Thank you for taking time to reach out to MOHELA requesting this important information.

MOHELA

